

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION

UNITED STATES OF AMERICA : CRIMINAL NO. 5:21-CR-00057-01  
VERSUS : JUDGE DONALD E. WALTER  
DEBORAH COOKSEY (01) : MAGISTRATE-JUDGE HORNSBY

**DEFENDANT'S LIST OF FORESEEABLE ISSUES**

1.

The Indictment alleges that the defendant filed a 2013 and a 2014 tax return with false statements as to the amount of gross receipts and sales from her tax preparation services. However, the Government does not state or allege whether the alleged false declaration created a material tax consequence.

2.

The defendant filed Forms 1040X for both years and believes that the Returns need to be amended again to accurately report her taxable income.

3.

Because the Revenue Agent in this case began an investigation of at least one (if not two) of the return preparers in Ms. Cooksey's office in calendar 2014/2015 and subsequently determined that he had a fraud case before he interviewed the defendant, a U.S. v. Tweel, 550 F.2d

297 (5<sup>th</sup> Cir. 1977) issue exists and all evidence derived therefrom should be suspended.

Respectfully submitted,

**LAW OFFICES OF J. RANDELL KEENE**

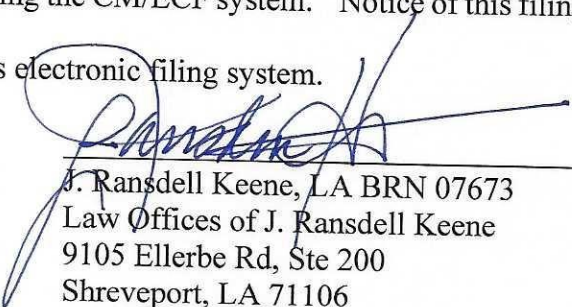
By: 

J. Ransdell Keene, LA BRN 07673

9105 Ellerbe Rd, Ste 200  
Shreveport, La 71106  
(318)219-3921  
(318)219-3920 (fax)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 27, 2021 a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel by operation of the court's electronic filing system.

  
J. Ransdell Keene, LA BRN 07673

Law Offices of J. Ransdell Keene

9105 Ellerbe Rd, Ste 200

Shreveport, LA 71106

(318)219-3921

(318)219-3920 (fax)

E-mail: Keene1040@aol.com